



European Association for
Quality Assurance in Higher Education

Recurring issues in reaching the ESG compliance – views from the ENQA's Agency Review Committee

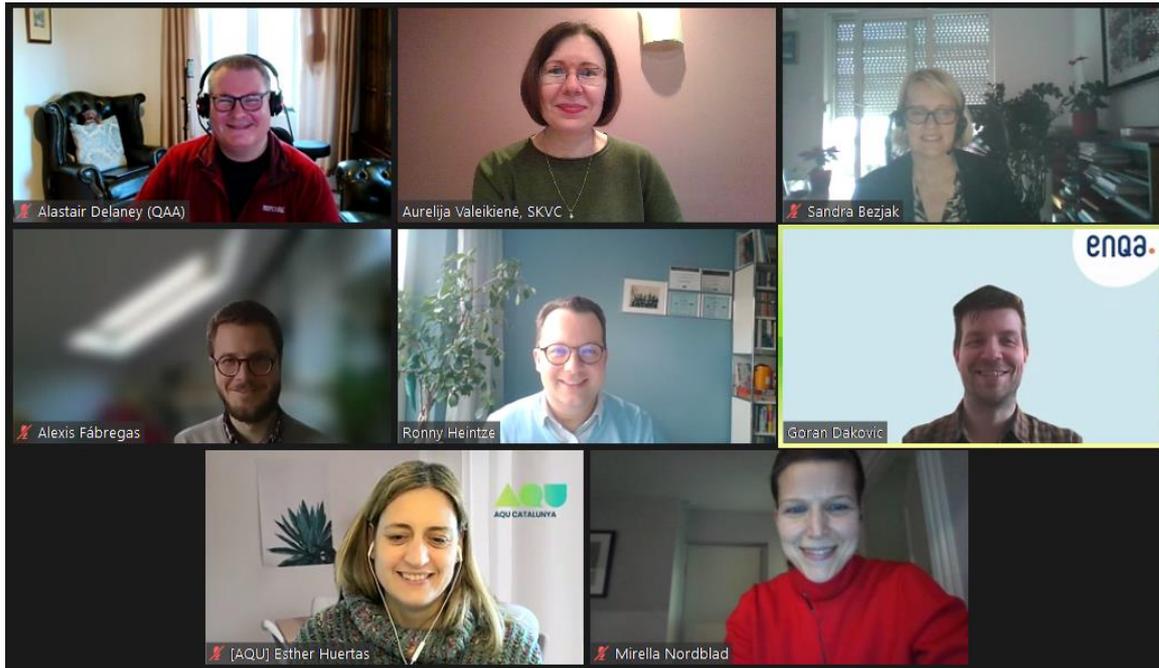
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3rd ENQA Seminar for Recently Reviewed Agencies - Cologne, 30-31 May 2022

Who we are?

- The Agency Review Committee shall deal with the internal quality assurance of the ENQA Agency reviews.
- Detailed procedures governing the operation of the Committee are set out in Rules of Procedure adopted by the General Assembly.

Art. 34, ENQA Statutes (as of 10 March 2021).



ARC endorsed by
ENQA GA on 22
April 2021.

Photo of the ARC zoom
meeting on 11 Feb 2022.

Principles of work

- 
- Trust in the panels and the triangulation method
 - Blind review by three members, joint discussion and consensus
 - Concerned about the integrity of the review process
 - Not seeking perfect reports, but asking for clarity of evidence, analysis and judgments, also consideration of the previous recommendations
 - Looking for consistency across reviews, also not “punishing” twice
 - Managing own conflicts of interests, abstaining if the case

Agency experience in reviews is diverse



So far – full reviews, targeted review reports in the pipeline

ESG 3.1 – Activities, policy and processes for quality assurance

Standard:

Agencies should undertake external quality assurance activities as defined in Part 2 of the ESG on a **regular basis**. They should have clear and explicit goals and objectives that are part of their publicly available **mission** statement. These should **translate into the daily work** of the agency. Agencies should ensure the involvement of **stakeholders** in their **governance** and work.

Guidelines:

To ensure the meaningfulness of external quality assurance, it is important that institutions and the public trust agencies. Therefore, the **goals and objectives** of the quality assurance activities are **described and published** along with the nature of **interaction** between the agencies and relevant **stakeholders** in higher education, especially the higher education institutions, and the scope of the agencies' work. The expertise in the agency may be increased by including **international members** in agency committees. **A variety of** external quality assurance **activities** are carried out by agencies to achieve different objectives. Among them are evaluation, review, audit, assessment, accreditation or other similar activities at programme or institutional level that may be carried out differently. When the agencies also carry out other activities, a clear **distinction between external quality assurance and their other fields of work** is needed.

ESG 3.1 – Activities, policy and processes for quality assurance

- Tips for the agencies and expert panels:
 - Strengthen the [self]reflection capacity
 - Include the statistics, showing regularity of activities (per procedure/per year)
 - Clarify as much as possible regarding the pilot procedures
- Issues, hindering achievement of the full compliance:
 - Absence of strategic planning and a weak link with yearly work plans and PDCA cycle (also refers to ESG 3.6)
 - Non-inclusion of students in governance
 - Non inclusion of other stakeholders in governance [labor market, civil society]
 - Lack of clarity regarding separation of the agency's external QA activities from consultancy in terms of its policies and communication via the agency website
 - Lenient approaches to HEIs passing accreditation even though some standards are not met (also relates to ESG 2.5)

ESG 2.7 – Complaints and Appeals

Standard:

Complaints and **appeals** processes should be **clearly defined** as part of the design of external quality assurance processes and communicated to the institutions.

Guidelines:

In order to safeguard the rights of the institutions and ensure **fair decision-making**, external quality assurance is operated in an open and accountable way. Nevertheless, there may be misapprehensions or instances of dissatisfaction about the process or formal outcomes. Institutions need to have access to processes that allow them to raise issues of concern with the agency; the agencies, need to handle such issues in a **professional way** by means of a **clearly defined process** that is **consistently applied**.

A complaints procedure allows an institution to state its dissatisfaction about the conduct of the process or those carrying it out.

ESG 2.7 – Complaints and Appeals

- Tips for the agencies and expert panels:
 - Provide statistics of cases received
 - Present their outcome
- Issues hindering full compliance:
 - One of the elements missing
 - Mixed up definitions of what is a complaint vs. an appeal
- Issues of concern:
 - Large number of procedures conducted, but no instances of complaints or appeals received at all – is it credible?
 - Rather informal handling of complaints, lack of transparency

ESG 2.3 – Implementing Processes

Standard:

External quality evaluation processes should be reliable, useful, predefined, consistently implemented and published. They include:

- self-evaluation or its equivalent;
- external evaluation, which usually includes a visit to a higher education institution;
- reports, as a result of external evaluation;
- **consistent follow-up.**

Guidelines:

External quality evaluation if conducted in professional, consistent and transparent manner ensures its acceptability and effect. Depending on the model of external quality assurance model, a research and higher education institution creates prerequisites for external quality evaluation by conducting self-evaluation and collecting other evidence-based materials. Written documents usually are supplemented with information obtained during interviews with various stakeholders, during a visit. Information collected during the evaluation is summarised in the reports (cf. Provision 2.5), drawn by external experts (cf. Provision 2.4). External quality assurance does not end with evaluation reports drawn by experts. Reports contain expressive guidelines for further actions to be taken by a higher education institution. Agencies are consistently carrying out follow-up by reviewing actions implemented by the higher education institution.

The type of follow-up depends on the model of external quality assurance.

ESG 2.3 – Implementing Processes

- Issues of concern:
 - Confusion about what is the follow-up
 - The next round of the external QA activity (e.g., re-accreditation) is not to be interpreted as follow-up
 - Systematic and consistent manner of implementation
 - Consideration of the context: who is responsible for it in a multi-player system?
 - Not meeting students during the site visits to HEIs

ESG 3.3 – Independence

- **Standard:**

Agencies should be independent and act autonomously. They should have full responsibility for their operations and the outcomes of those operations without third party influence.

- **Guidelines:**

Autonomous institutions need independent agencies as counterparts.

In considering the independence of an agency the following are important:

- **Organisational independence**, demonstrated by official documentation (e.g. instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;

- **Operational independence**: the definition and operation of the agency's procedures and methods as well as the nomination and appointment of external experts are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;

- **Independence of formal outcomes**: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

Anyone contributing to external quality assurance activities of an agency (e.g. as expert) is informed that while they may be nominated by a third party, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely **based on expertise**.

ESG 3.3 – Independence

Issues of concern:

- Market-driven dangers:
 - too tight relations with a higher education community in which the agency operates and upon fees of which it depends
 - independence from the private owner and decision making
- Regulatory framework limitations:
 - public agencies risk to be [perceived] less independent from public authorities in terms of EQA frameworks set and funding allocated
 - In cases when other authorities makes decisions based on the agency's work – the risk to amend / dismiss agency reports
- Efficiency and competence of those making decisions

ESG 3.4 – Thematic Analysis

Standard:

Agencies should **regularly** publish reports that describe and analyse the general findings of their external quality assurance activities.

Guidelines:

In the course of their work, agencies gain information on **programmes** and **institutions** that can be useful beyond the scope of a single process, providing material for **structured analyses** across the higher education system. These findings can contribute to the reflection on and the improvement of quality assurance **policies** and **processes** in **institutional, national and international contexts**. A thorough and careful analysis of this information will show **developments, trends** and **areas of good practice** or **persistent difficulty**.

ESG 3.4 – Thematic Analysis

- Issues of concern:
 - No system for analysis and publishing general findings of different evaluations:
 - Who and how decides the topics
 - Integration with annual / strategic work plans
 - Scope (programme / HEI level; policies / processes; institutional / national / international)
 - Little resources allocated for the tasks
 - Dissemination channels
 - Impact / value
 - Irregular / too few analysis
 - Producing some analytics, but not publishing it
- Tips:
 - [ESG 2015–2018 ENQA Agency Reports: Thematic Analysis. By Carmen Tomas And Maria Kelo. 01 April 2020. ENQA Occasional Paper 28.](#)

ESG 3.5 – Resources

Standard:

Agencies should have adequate and appropriate resources, both **human** and **financial**, to carry out their work.

Guidelines:

It is in the public interest that agencies are adequately and appropriately funded, given higher education's important impact on the development of societies and individuals. The resources of the agencies enable them to organise and run their external quality assurance activities in an **effective** and **efficient manner**.

Furthermore, the resources **enable** the agencies **to improve, to reflect** on their practice and **to inform** the public about their activities.

ESG 3.5 – Resources

Issues of concern:

- The need to strengthen strategic and self-reflective capacity
- Lack of resources to engage in thematic analysis
- Stringent resources for publicity
- Prospects of agency resources vs. the agency's existing resources and ability to implement external quality assurance procedures

ESG 2.1 – Consideration Of Internal Quality Assurance

Standard:

External quality assurance should address the effectiveness of the internal quality assurance processes described in Part 1 of the ESG.

Guidelines:

Quality assurance in higher education is based on the institutions' responsibility for the quality of their programmes and other provision; therefore it is important that external quality assurance recognises and **supports institutional responsibility** for quality assurance. To ensure the link between internal and external quality assurance, external quality assurance includes **consideration of the standards of Part 1**. These may be addressed differently, depending on the type of external quality assurance.

ESG 2.1 – Consideration of Internal Quality Assurance

Issues of concern:

- A challenging standard for the panels of experts to analyse, not only to provide a mapping grid, but to reflect
- Agency's activities abroad need to be fully included
- An overview of new activities and what reasonable confidence there could be in them
- An area that needs the biggest development – ESG 1.4 where:
 - the QA methodologies should clearly require recognition and admission being based on the Lisbon Recognition Convention, and agencies being able to show how this materialises in practice
 - cooperation between the QA agency, the ENIC-NARIC Centre, HEIs, and other bodies.

ESG 2.5 – Criteria For Outcomes

Standard:

Any reports or decisions made on the basis of external evaluation results must be based on **clear** and **publicly available criteria** that were **applied consistently**, irrespective whether the process is or not directed to formal decision-making.

Guidelines:

External quality evaluation, and in particular its results, have significant impact on institutions or their programmes under evaluation and regarding which decisions are made. For the reasons of impartiality and reliability, external quality evaluation results are based on predetermined and publicly available criteria which are applied consistently and are based on evidences. Depending on the system of external quality evaluation, evaluation results can differ, e.g. can be presented as recommendations, assessments or formal decisions.

ESG 2.5 – Criteria For Outcomes

Issues of concern:

- Lack of evidence on robustness – talking about possible types of outcomes but not providing clear statistics how they turned to be applied per procedure / year.



Brian Tracy ✓
@BrianTracy



"Excellence is not a destination." @BrianTracy
#inspiration #quote



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